REMARKS

This Amendment and the following remarks are intended to fully respond to the Final Office Action dated July 27, 2005. In that Office Action, claims 1-27 were examined, and all claims were rejected. However, Applicants would like to point out that claims 22-25 were canceled, and claims 26-29 were added in the Response and Amendment filed on April 13, 2005. Claims 1-27 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Schwartz et al. (USPN 6,473,609), hereinafter referred to as "Schwartz," in view of Himmel (USPN 6,167,441), hereinafter referred to as "Himmel," and claim 28 is rejected under 35 U.S.C. § 103(a) as being unpatentable over Schwartz et al., in view of Himmel, and further in view of Dean (US 20020152244), hereinafter referred to as "Dean." Reconsideration of these rejections, as they might apply to the original and amended claims in view of these remarks, is respectfully requested.

In this Response, claim 1 and claim 13 are amended. No claims are canceled herein. No new claims are added herein. Therefore, claims 1-21 and 26-29 remain present for examination.

Claim Rejections – 35 U.S.C. § 103

Claims 1-27 are rejected under 35 U.S.C. § 103(a) as being unpatentable over Schwartz in view of Himmel. Applicants respectfully traverse the §103 rejections because either the Examiner has failed to state a prima facie case of obviousness or the amended claims render the Examiner's arguments moot. A prima facie case of obviousness can only be established when all of the following requirements are met: (1) there must be some suggestion or motivation, in the references themselves, to combine the references; (2) there must be a reasonable expectation of success; and (3) the reference or combination of references must teach or suggest all the claim limitations. See, MPEP §§ 706.02(j) and 2143. The combination of references cited by the Examiner must teach or suggest every limitation of the claimed invention. CFMT v. CFM Tech., 349 F.3d 1333, 1342 (Fed. Cir. 2003). See also, In re Royka; MPEP § 2143.03. For independent claim 1, Schwartz and Himmel, neither alone nor in combination, teaches "a page file including information describing the content to be returned to the target device." For independent claim

13, Schwartz and Himmel, neither alone nor in combination, teaches "a page file including values for device-specific content."

Embodiments of the present invention are directed at how and what content is displayed on a target device. To create the display of content on the target device, properties are used in a single specially-written page file to allow choices about how and what content is displayed; these choices are based on the device that is to display the content. As discussed on pages 7-9 of the application, some properties provide for different image files that are displayed on different devices, while other properties may change the font or type of user interface control displayed, e.g., a radio button or a text box.

In contrast, Schwartz discloses a system that reduces the overall amount of data needed to transmit content from a server to a target device. See, Abstract. Schwartz is directed at reducing the amount of computing power needed on a mobile device. See, col. 2, lines 11-15 ("There is, therefore, a great need for a solution that enables mobile devices to freely access information on the Internet without providing these computing resources in the mobile devices.") Schwartz solved this problem by creating a compact data format (as in col. 2, lines 59-62, "the control engine communicates with an interface engine using a compact data format that is efficiently transportable in the wireless data network") and also by mapping universal resource locators (URLs) with address identifiers to reduce the amount of text (e.g., col. 3, lines 5-9, "The link server device replaces universal resource locators in the incoming message with address identifiers, and manages an address table mapping each universal resource locator with an address identifier."). Schwartz notes that these URLs are not displayed content, but are hidden data associated with some displayed user interface element. See, col. 13, line 66 to col. 14, line 2 ("[E]ach of the menu items in the original HTML file is associated with a numeral that corresponds to a resource locator in the card containing the menu items.").

The system in Schwartz is designed not to change the content, but only to transmit it more effectively to the target device and remove the "wordiness" inherent in markup language pages. Schwartz specifically states that content in an original file in a markup language are converted into a more compact data structure, which, when displayed on the mobile device, results in the display of the same content. See, col. 9, lines 29-36 ("Therefore, an HDML file received is first analyzed by message digester 316 and then converted through converter 318 into a set of screen commands that cause a mobile device, upon receiving the screen commands, to

display the contents in the HDML file according to the screen commands."). Furthermore, Schwartz's system performs the same conversion regardless of the target device.

Himmel discloses a system that includes an intercepting agent that can redirect, depending on the type of the requesting client device, a user request to a pre-created version of the requested file. See, col. 2, lines 25-52. The system of Himmel supports different web client types by storing and delivering one of a set of web pages (e.g., col. 4, lines 42-45, "The invention enables a plurality of web client types to be supported by an Internet application by creating a set of web pages each of which is formatted for readability for a particular supported device.") While one URL is requested by the client in Himmel, the request is redirected, at the web server, to one of the plurality of web pages that was previously created for the particular client device. See, col. 4, lines 45-54. Himmel does discuss dynamically changing the HTML content of a web page before sending a rendered web page to a particular client device (e.g., col. 7, lines 40-44, "The invention provides that some of the customization of the page interface is static with prebuilt web pages for a supported client device or set of client devices. Other aspects of the customization may be dynamic modification of the web page content performed on the fly."). To accomplish dynamic changing of the HTML content, Himmel discusses redirecting embedded URLs (e.g., col. 7, lines 46-53, "Requests from clients with similar screen sizes, but different display characteristics such as color palettes may be directed to the same URL, however, the embedded URLs which point to image data within the overall page may be dynamically selected to provide the image which will look the best for the detected client device. Yet others such as font or font size can be dynamically adjusted in the HTML on the fly.").

The combination of Schwartz and Himmel does not teach or disclose the elements of claim 1 or claim 13:

Claim 1 and claim 13 include elements that Schwartz does not teach or disclose. Specifically, Schwartz does not teach or disclose a single page file that includes device-specific user display properties of the content as now claimed. In Schwartz, the page file is a standard HTML, HDML, or other markup language file with no special attributes. See, e.g., Summary of Invention. Schwartz even discloses an exemplary markup language page file (col. 9, lines 4-15), which is shown in rendered form in FIG. 5A. Applicants point out that the exemplary markup language file in Schwartz contains no choices for user display properties of the content as

claimed. Furthermore, there is no discussion in Schwartz of any markup language files that are in any way written to provide choices based on what type of device the markup language file will be written on.

In addition, Applicants point out that Schwartz makes the same conversion regardless of the type of display device. While Schwartz does disclose identifying the display device, this identification has no effect on the actual conversion being performed and is only used for account authentication and communication protocol purposes. See, e.g., col. 8, lines 12-42 describing the exact contents and uses for device IDs. Schwartz does not teach or disclose doing a different conversion for different device IDs nor does Schwartz disclose displaying different content on different devices based a device type as now claimed.

Schwartz does not teach or disclose evaluating the choices in the page file as now claimed. The Examiner cited col. 15, line 65 to col. 16 line 7 as anticipating this limitation of claim 1. However, that section in Schwartz is directed to choices made by a user for additional content and is unrelated to evaluating user interface display properties of content as now claimed. Applicants point out that the choices made in the claimed invention are automatically made based on the device class and are not user selections as described by Schwartz.

As with Schwartz, the several elements noted above are also not taught or disclosed by Himmel. In particular, Himmel also does not teach a page file that includes device-specific user display properties of the content as now claimed. Rather than a single page file that can just-in-time compile and render web page files, Himmel teaches a redirections of a file request to one of several prebuilt web pages. Himmel does discuss dynamic redirection but never discloses that dynamic redirection is accomplished using a page file (see, col. 7, lines 40-53) or that each specific client device may have its own web page created upon a user request, (e.g., col. 7, lines 46-49, "Requests from clients with similar screen sizes, but different display characteristics such as color palettes may be directed to the same URL..."). Himmel, when discussing redirection, teaches a redirection agent (e.g., col. 5, lines 31-37, "This invention includes a server application that intercepts, or otherwise handles, the HTML requests from requesting clients to a particular HTTP server or application thereon. This application, the "client-smart agent", attaches itself to the HTTP server and redirects the server to the correct page depending on the client device.") The redirection agent does not just-in-time compile the web page and then render the web page according to properties in the page file, but redirects requests to a web page or requests in the

web page to prebuilt web pages at the web server. Thus, Himmel provides several web pages to which the agent can redirect user requests – even the dynamic redirections. Himmel never teaches a single page file upon which all user requests are sent and uses a just-in-time compilation to generate a set of server side objects based on the device-specific properties for the client device and which are then used to render the web page sent to the client.

Further, a developer must create the several web pages that the agent can redirect the user requests (e.g., col. 9, lines 11-18, "The utilities would enter into a dialog with the utility to make a respective page for each supported device. For example, to adapt a prototype page to a WebTV client device which has a smaller effective display space than a computer monitor, the developer might be given the option of dragging and dropping objects from the prototype web page to new positions or to automatically include a scroll bar in the page.") Himmel never teaches the utilization of a single page file that can generate all needed web pages. Rather, Himmel presents the exact problem mentioned in the background section of the present application – managing multiple files for visual elements. See, page 2, lines 1-3. The present invention as defined in the claims solves the problems presented in Himmel.

For at least the reasons given above, Applicants believe that claim 1 and claim 13 as amended are not obvious in view of Schwartz and further in view of Himmel. Therefore, Applicants respectfully request the Examiner withdraw his rejections and find claim 1, and its dependent claims 2-12 and 26-29, and claim 13, and its dependent claims 14-21, in a condition for allowance.

Conclusion

This Amendment fully responds to the Office Action mailed on July 27, 2005. Still, that Office Action may contain arguments and rejections and that are not directly addressed by this Amendment due to the fact that they are rendered moot in light of the preceding arguments in favor of patentability. Hence, failure of this Amendment to directly address an argument raised in the Office Action should not be taken as an indication that the Applicants believe the argument has merit. Furthermore, the claims of the present application may include other elements, not discussed in this Amendment, which are not shown, taught, or otherwise suggested by the art of record. Accordingly, the preceding arguments in favor of patentability are advanced without prejudice to other bases of patentability.

It is believed that no further fees are due with this Response. However, the Commissioner is hereby authorized to charge any deficiencies or credit any overpayment with respect to this patent application to deposit account number 13-2725.

In light of the above remarks, it is believed that the application is now in condition for allowance, and such action is respectfully requested. Should any additional issues need to be resolved, the Examiner is requested to telephone the undersigned to attempt to resolve those issues.

Respectfully submitted,

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